

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA,

- against -

19 Cr. 472 (PAC)

SALVATORE TAGLIAFERRO, et al,

NOTICE OF MOTION

Defendant.

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TO: AUSA Thomas A. McKay
AUSA Jarrod L. Schaeffer

PLEASE TAKE NOTICE that upon annexed Affirmation and the accompanying Memorandum of Law, and all pleadings and proceedings previously had herein, Defendant SALVATORE TAGLIAFERRO, by and through his attorneys, Michael K. Bachrach, Esq., and Richard H. Rosenberg, Esq., will move this Court before the Honorable Paul A. Crotty, United States District Court Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007, on a date and time to be determined by the Court, for an order granting the following motions:

- (1) Motion to sever the trials of Salvatore Tagliaferro and John Defalco to avoid prejudicial spillover being caused to Tagliaferro through the admission of evidence of Defalco's attempts to hinder the prosecution of this case. In the alternative, and at a minimum, Counts 4 and 5 should be severed from a joint trial of both defendants for those same reasons;
- (2) Motion for an offer of proof or informative outline explaining how the government intends to independently corroborate Tagliaferro's participation in the charged conspiracy without reliance on co-conspirator statements;
- (3) Motion for disclosure of Rule 806 material;
- (4) Motion for disclosure of Rule 807 material;

- (5) Motion for disclosure of Rule 608 and Rule 609 material;
- (6) Motion for disclosure of charts, graphs, diagrams, and summaries;
- (7) Motion to direct the Government to retain rough notes and writings;
- (8) Motion for immediate disclosure of Brady material;
- (9) Motion for permission to join in relevant motions submitted by co-defendant;
- (10) Motion for leave to submit further motions;

and/or for any other relief the Court finds just and proper.

Dated: New York, New York
January 31, 2020

Respectfully submitted,

/s/ Michael K. Bachrach

Michael K. Bachrach
Richard H. Rosenberg
Attorneys for Defendant Salvatore Tagliaferro

cc: The Hon. Paul A. Crotty (by ECF and by mail)
All parties of Record (by ECF)